

# **Exhibit 8**

## Seguin, Paula

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**From:** Glynn, Katie <KGlynn@lowenstein.com>  
**Sent:** Monday, September 2, 2019 8:31 PM  
**To:** 'Dan Chiorean'  
**Cc:** Blad, Leiv; Jaramillo, Zarema; 'Daniel Litvin (dlitvin@garwingerstein.com)'; 'van der Meulen, Robin'; 'Deborah Elman'; Chris Letter; 'Kristyn Fields'; 'David Raphael'; 'Kelly Tucker'; Caitlin G. Coslett  
**Subject:** RE: In re Novartis and Par Antitrust Litig. (SDNY)  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dan,

Thus far, Lupin and Novel have been unable to locate additional responsive documents. They are continuing to conduct a reasonable search and, to the extent they identify additional responsive documents, those documents will be produced. We understand that fact discovery is ongoing and Plaintiffs' September 3 document production deadline is arbitrary. Given that Lupin is still searching for responsive documents, there is no need for Plaintiffs to file a motion to compel. Further, the documents produced so far show when the companies received FDA approval, when they began marketing generic Exforge, and how much generic Exforge they have sold since launch. Please explain what additional information belonging to these third-parties is necessary for Plaintiffs to continue litigating their antitrust case against Par and Novartis.

Thank you,  
Katie

**Katie R. Glynn**  
Associate  
Lowenstein Sandler LLP

**T:** 202.753.3824  
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**From:** Dan Chiorean <dchiorean@odrlaw.com>  
**Sent:** Thursday, August 22, 2019 11:50 AM  
**To:** Glynn, Katie <KGlynn@lowenstein.com>  
**Cc:** Blad, Leiv <LBlad@lowenstein.com>; Jaramillo, Zarema <ZJaramillo@lowenstein.com>; 'Daniel Litvin (dlitvin@garwingerstein.com)' <dlitvin@garwingerstein.com>; 'van der Meulen, Robin' <rvandermeulen@labaton.com>; 'Deborah Elman' <delman@gelaw.com>; Chris Letter <cletter@odrlaw.com>; 'Kristyn Fields' <kfields@faruqilaw.com>; 'David Raphael' <draphael@ssrllp.com>; 'Kelly Tucker' <ktucker@gelaw.com>; Caitlin G. Coslett <ccoslett@bm.net>  
**Subject:** RE: In re Novartis and Par Antitrust Litig. (SDNY)

Good morning Katie,

Lupin and Novel's last productions were on August 5, 2019, over two weeks ago. Plaintiffs asked over 1.5 months ago that Lupin and Novel complete their productions by August 5, 2019, yet there are still multiple outstanding gaps in both productions, as outlined in my email on August 8 below. In other words, Lupin and Novel still have not produced all of the documents they agreed to produce, as set forth in your April 19, 2019 letter and our subsequent meet & confers.

Plaintiffs ask that Lupin and Novel both complete the *entirety* of their outstanding productions no later than September 3, 2019. If we do not receive the documents by that date, or we receive another partial/incomplete production, Plaintiffs will be forced to move to compel.

Many thanks,  
Dan

**Dan Chiorean**

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**From:** Dan Chiorean

**Sent:** Tuesday, August 13, 2019 5:19 PM

**To:** 'Glynn, Katie' <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>

**Cc:** 'Blad, Leiv' <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; 'Jaramillo, Zarema' <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)> <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>; 'David Raphael' <[draphael@ssrllp.com](mailto:draphael@ssrllp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; Caitlin G. Coslett (<[ccoslett@bm.net](mailto:ccoslett@bm.net)> <[ccoslett@bm.net](mailto:ccoslett@bm.net)>)

**Subject:** RE: In re Novartis and Par Antitrust Litig. (SDNY)

Katie,

In addition to the three questions in my email below, attached please find Plaintiffs' correspondence with questions regarding recently produced sales and chargeback data from Lupin and Novel.

Thanks,  
DC

**Dan Chiorean**

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**From:** Dan Chiorean

**Sent:** Thursday, August 8, 2019 11:39 AM

**To:** Glynn, Katie <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Jaramillo, Zarema <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin

([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com))' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>; 'David Raphael' <[draphael@ssrllp.com](mailto:draphael@ssrllp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; Caitlin G. Coslett ([ccoslett@bm.net](mailto:ccoslett@bm.net)) <[ccoslett@bm.net](mailto:ccoslett@bm.net)>

**Subject:** RE: In re Novartis and Par Antitrust Litig. (SDNY)

Katie,

We have received and loaded your most recent production. We'll let you know if we have questions about these documents.

Additionally, we had requested that Lupin and Novel complete their productions by August 5, 2019. This production does not appear to be such a completion. At the very minimum, Plaintiffs are still missing:

1. Lupin's supplemental production of documents responsive to Request No. 3, i.e. Lupin's complete regulatory correspondence for ANDA No. 090245.
2. Lupin's production of documents responsive to Request No. 5.
3. Novel's production of documents responsive to Request Nos. 4 and 5

When can we expect to receive these documents?

Regards,  
Dan

**Dan Chiorean**

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**From:** Glynn, Katie <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>

**Sent:** Monday, August 5, 2019 1:00 PM

**To:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Jaramillo, Zarema <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin' ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com))' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>; 'David Raphael' <[draphael@ssrllp.com](mailto:draphael@ssrllp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>

**Subject:** In re Novartis and Par Antitrust Litig. (SDNY)

Counsel,

Please see the attached correspondence. The referenced Sharefile links are below, and the password will be sent via separate cover.

<https://lowensteinsandler.sharefile.com/d-saa3bc11c8df4d4b8>

<https://lowensteinsandler.sharefile.com/d-sb3f74af303845d19>

Thanks,  
Katie

**Katie R. Glynn**  
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